

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ANN MITCHELL,

Plaintiff,

v.

HALLMARK HEALTH SYSTEM, INC./  
LAWRENCE MEMORIAL HOSPITAL  
and JULIE CHASE SHAUGHNESSY,

Defendants.

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) Civil Action No. 04-cv-12169-REK  
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**JOINT MOTION TO EXTEND SCHEDULING ORDER**

The Parties hereby jointly move the Court to amend the Scheduling Order in this case to:

(1) extend the fact discovery period to April 11, 2006; (2) extend the period for service of Rule 56 Motions to May 12, 2006; (3) extend the period for oppositions to Rule 56 Motions to June 16, 2006; and (4) adjust all subsequent case deadlines and events (including expert discovery (if necessary), pre-trial and trial dates) accordingly. The parties also request that the Court hold a status/motions conference on or about March 13, 2006.

As grounds for this Motion, the parties state as follows:

1. Under the present Scheduling Order, discovery in this matter is to be completed by February 15, 2005.
2. The parties are diligently working to complete discovery and need a limited amount of additional time in which to complete the exchange of documents and the taking of depositions. In addition, the parties require the brief extension of time sought in order to resolve and/or narrow outstanding discovery disputes prior to involving the Court.

3. The parties agree that the additional time requested will allow them to conclude the discovery process in a reasonable, fair and just manner.

For the foregoing reasons, the parties respectfully request that the deadlines in this case be extended as follows:

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|----|---------------------------------------|----------------|
| 1) | Fact discovery closes:                | April 11, 2006 |
| 2) | Rule 56 Motions filed:                | May 12, 2006   |
| 3) | Oppositions to Rule 56 Motions filed: | June 16, 2006  |

The parties also request that all subsequent case deadlines and events (including expert discovery (if necessary), pre-trial and trial dates) be adjusted accordingly and that the Court hold a status/motions conference on or about March 13, 2006.

Respectfully submitted,

ANN MITCHELL

By her attorney,

HALLMARK HEALTH SYSTEM, INC./  
LAWRENCE MEMORIAL HOSPITAL  
and JULIE CHASE SHAUGHNESSY

By their attorneys,

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Dated: February 6, 2006